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Filed : June 22, 2001

### REMARKS

Claims 1-6 are pending in the present application. By this paper, Claim 1 has been amended. Therefore, Claims 1-6 are presented for further consideration.

In the Office Action, independent Claim 1 was rejected as being anticipated by U.S. Patent 6,049,390 by Notredame et al. The Office Action cites Notredame et al. for disclosing "autonomic segments" as claimed in Applicant's Claim 1. Applicant has amended Claim 1 to more clearly define the autonomic segment element. Amended Claim 1 recites, *inter alia*, "merging the decompressed autonomic segments independent of any other autonomic segments associated with the image reproduction." At least this feature is not disclosed in or taught by the references of record.

Notredame et al. relates to a method and an apparatus for merging a plurality of data with the merging being carried out without decompressing the data. (See Field of the Invention). The merging generates compressed image data that represents the page with the merging step essentially occurring in the compressed domain. (see Col. 5, lines 53-57). Notredame et al. teaches to repeat the merging, decompressing and printing steps for each page that has to be printed. (see Col. 5, lines 64-65). However, by merging page elements in the compressed domain, the method relied upon in Notredame et al. may degrade the accuracy of a variety of image operations (rotation, clipping, merging, translation...) performed on the compressed page elements.

Unlike merging compressed page elements of a page as disclosed in Notredame et al., Applicant's merging step "merges the decompressed autonomic segments." The image data of the autonomic segments of the respective page elements are retrieved from the memory and decompressed before being delivered to the merge system. (see page 9, lines 7-9 and Figure 3). Applicant's method enables a variety of image operations (rotation, clipping, merging, translation...) without previous computation or the need to store the same page element twice. (see page 3, lines 9-12).

Applicant's Claim 1 is further distinguishable from the method described in Notredame et al. since Applicant's merging step "merges the autonomic segments independent of any other autonomic segments associated with the image reproduction."

Notredame et al teaches that for each page, the compressed page elements (LW, CT) are first merged separately to form final line work compressed page data and final CT compressed

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page data. The final line work compressed page data is formed from the compressed line work page element data of all the page elements. The final CT compressed page data is formed from the compressed CT page element data of all the page elements. (see Col. 6, lines 27-31 and Col. 13, lines 48-53). Only after all of the page elements for each data type in a given page are separately merged, does Notredame et al. perform decompression. Accordingly, the method in Notredame et al. decompresses the final LW page data and the final CT page data. These decompressed complete pages are then combined into a single final page. Notredame et al. provides no method for merging anything less than all of the page elements for an entire page as the page elements of Notredame et al. are not autonomic segments.

Applicant's autonomic segments contain all of the information necessary for the reproduction of a region of the image portion. The term "autonomic" is used because no data from other autonomic segments is needed to reproduce the region of the described image portion. (see page 8, lines 3-5). Accordingly, Applicant's autonomic segments are in a format that allows their easy reproduction without the use of data from autonomic segments for other regions of the image reproduction.

Thus, Claim 1 recites that the autonomic segments required to generate a fraction of an image reproduction are merged "independent of any other autonomic segments associated with the image reproduction." For example, in known storing methods using JPEG compression, data from a previous region of the image is needed to reconstruct the data of the next region of the image. Requiring data from adjacent regions may lead to excessive processing effort for reconstruction of the region, especially when the page element associated with the region is to be rotated, mirrored, etc.

Accordingly, Notredame et al. does not disclose nor teach merging of "the decompressed autonomic segments" or merging "autonomic segments independent of any other autonomic segments associated with the image reproduction." The prior art of record does not cure these deficiencies in Notredame et al. Applicant respectfully requests allowance of amended Claim 1.

Claims 2-6 depend directly or indirectly from Claims 1 and thus are patentable for at least the same reasons that Claim 1 is patentable over the art of record. Therefore, allowance of Claims 1-6 is respectfully requested.

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### CONCLUSION

The Applicant has endeavored to address all of the concerns of the Examiner in view of the Office Action directed to the above-identified application. Accordingly, amendments to the claims, the reasons therefore and arguments in support of the patentability of the pending claims are presented above.


In light of the above amendments and remarks, reconsideration and withdrawal of the outstanding rejections is specifically requested. If the Examiner finds any remaining impediment to the prompt allowance of these claims that could be clarified with a telephone conference, the Examiner is respectfully requested to initiate the same with the undersigned.

Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

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